

# EXHIBIT A

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**Subject:** FWC - Challenge to "Confidential" Designations  
**Date:** Saturday, July 29, 2023 at 9:39:02 AM Eastern Daylight Time  
**From:** Corey Stern  
**To:** Michael A. Olsen, Jim Campbell  
**CC:** Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Susan Smith, Brian MacDonald, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block  
**Attachments:** 2023.07.29 Letter to Veolia (Confidential Designations)[35].pdf  
Counsel for Veolia –

Please see correspondence attached related to the above-referenced matter.

Best,

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July 29, 2023

**VIA EMAIL & CERTIFIED MAIL (RRR)**

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**RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS  
CHALLENGE TO “CONFIDENTIAL” DESIGNATIONS**

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,<sup>1</sup> Plaintiffs hereby formally challenge the “Confidential” designations of the following documents:

1. VWNAOS085515
2. VWNAOS085515.0001
3. VWNAOS085516
4. VWNAOS085516.0001
5. VWNAOS090992
6. VWNAOS090992.0001
7. VWNAOS090992.0002
8. VWNAOS090992.0003
9. VWNAOS090992.0004
10. VWNAOS091116
11. VWNAOS091117
12. VWNAOS091117.0001
13. VWNAOS091121
14. VWNAOS091123
15. VWNAOS091124

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<sup>1</sup> See Case No. 16-cv-10444 (ECF. No. 1255-3).

16. VWNAOS091129  
17. VWNAOS091129.0001  
18. VWNAOS091160  
19. VWNAOS091160.0001  
20. VWNAOS164993  
21. VWNAOS164993.0001  
22. VWNAOS164994  
23. VWNAOS164994.0001  
24. VWNAOS526234  
25. VWNAOS528237  
26. VWNAOS528237.0001  
27. VWNAOS528366  
28. VWNAOS528366.0001  
29. VWNAOS528366.0002  
30. VWNAOS528366.0003  
31. VWNAOS552988  
32. VWNAOS552988.0001  
33. VWNAOS552989  
34. VWNAOS552989.0001  
35. VWNAOS552999  
36. VWNAOS552999.0001  
37. VWNAOS553019  
38. VWNAOS553019.0001  
39. VWNAOS553020  
40. VWNAOS553020.0001  
41. VWNAOS553134  
42. VWNAOS553290  
43. VWNAOS553290.0001  
44. VWNAOS553469  
45. VWNAOS555473  
46. VWNAOS555473.0001  
47. VWNAOS555473.0002  
48. VWNAOS555522  
49. VWNAOS555522.0001  
50. VWNAOS555574  
51. VWNAOS555574.0001  
52. VWNAOS555574.0002  
53. VWNAOS555574.0003  
54. VWNAOS555602  
55. VWNAOS555602.0001  
56. VWNAOS557195  
57. VWNAOS557195.0001  
58. VWNAOS557195.0002  
59. VWNAOS557207  
60. VWNAOS557212  
61. VWNAOS557212.0001  
62. VWNAOS557213  
63. VWNAOS557213.0001  
64. VWNAOS558968

65. VWNAOS558981  
66. VWNAOS559054  
67. VWNAOS559054.0001  
68. VWNAOS559054.0002  
69. VWNAOS559054.0003  
70. VWNAOS559054.0004  
71. VWNAOS559056  
72. VWNAOS559056.0001  
73. VWNAOS559056.0002  
74. VWNAOS559056.0003  
75. VWNAOS559056.0004  
76. VWNAOS559056.0005  
77. VWNAOS559057  
78. VWNAOS559057.0001  
79. VWNAOS559057.0002  
80. VWNAOS559057.0003  
81. VWNAOS559057.0004  
82. VWNAOS559057.0005  
83. VWNAOS559057.0006  
84. VWNAOS559324  
85. VWNAOS559324.0001  
86. VWNAOS559325  
87. VWNAOS559325.0001  
88. VWNAOS559351  
89. VWNAOS559379  
90. VWNAOS559379.0001

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations.

Very Truly Yours,

**LEVY KONIGSBERG, LLP**



Corey M. Stern

Cc: *(By email only)*  
*Theodore Leopold & Jordan Connors (Class Counsel)*  
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*Todd Weglarz & Donald Dawson (Counsel for certain Legionella Plaintiffs)*  
*Michael Williams & Eric Rey (Counsel for the USEPA)*  
*All Veolia Entities' Counsel of Record or otherwise known*